

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(Charlotte Division)

In re:)	Chapter 11
)	
B GSE GROUP, LLC,)	Case No. 23-30013
)	
Debtor.)	

***EX PARTE* MOTION FOR ORDER SHORTENING NOTICE**

NOW COMES debtor B GSE Group, LLC (the “Debtor”), by this *ex parte* motion, and respectfully requests the entry of an Order shortening the prescribed notice of the *Motion for Approval of Asset Sale* (the “Motion”) [Doc. 172]. In support thereof, the Debtor states as follows:

1. An expedited hearing on the Motion is necessary so that it may be considered along with confirmation of the Debtor’s plan of reorganization pursuant to section 1123 of the Bankruptcy Code.

2. The Debtor respectfully requests that this Court shorten the required notice period for the Motion pursuant to Bankruptcy Rule 9006 so that a hearing can be held on May 11, 2023 at 9:30 a.m. before the Honorable J. Craig Whitley, at the United States Bankruptcy Court, Charles Jonas Federal Building, LTB Courtroom 2B, 401 West Trade Street, Charlotte, North Carolina.

3. The Court previously set a hearing date of May 11, 2023 in this matter, with the requirement that the Motion be filed on or before today’s date (May 1, 2023). The Debtor has filed its Sale Motion on the timeline mandated by the Court.

WHEREFORE, the Debtor prays the Court to shorten the applicable notice period as set forth above, and for such other relief as is just and proper.

Dated: Charlotte, North Carolina
May 1, 2023

MOON WRIGHT & HOUSTON, PLLC

/s/ Richard S. Wright
Richard S. Wright (NC Bar No. 24622)
212 N. McDowell Street, Suite 200
Charlotte, North Carolina 28204
Telephone: (704) 944-6560
Facsimile: (704) 944-0380
Counsel for the Debtor